

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

**INQUIRY CONCERNING SERVICE
PERFORMANCE MEASUREMENT DATA**

Docket No. PI2016-1

REPLY COMMENTS OF THE UNITED STATES POSTAL SERVICE

(February 8, 2016)

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The United States Postal Service hereby submits its reply to comments filed by parties in response to Postal Regulatory Commission Order No. 2791.¹

OVERVIEW

This docket was initiated by the Commission in response to a United States Government Accountability Office (GAO) report regarding the market-dominant product service performance measurement systems of the Postal Service.² These data collection and reporting systems are operated by the Postal Service in accordance with sections 3652(a), 3691(b)(1)(D) and 3691(b)(2) of title 39 United States Code. They generate specific service performance data prescribed by the Commission at title 39 Code of Federal Regulations Part 3055. The Commission utilizes the data to fulfill its section 3653(b)(2) responsibility to issue a determination regarding whether service standards in effect during a year were met, and its section 3653(d) obligation to evaluate whether postal management operational goals established under sections 2803 and 2804 have been met. It is the view of the Postal Service that PRC Order No. 2791 should be viewed in this context.

Referencing GAO Report 15-756, PRC Order No. 2791 identified the following topics as subjects for commentary:

¹ See, PRC Order 2791, Notice Establishing Docket Concerning Service Performance Measurement Data (October 29, 2015); see *also* Comments of the Public Representative (December 14, 2015), and Comments of the Association for Postal Commerce and Major Mailers Association (hereinafter, the “Joint Commenters”) (December 14, 2015).

² See *United States Postal Service: Actions Needed to Make Delivery Performance Information More Complete, Useful and Transparent*. GAO-15-756, Government Accountability Office (September 30, 2015), (hereinafter, GAO Report 15-756).

1. Describe any potential deficiencies with respect to the accuracy, reliability, and representativeness of the current service performance measurement data. If data are limited in a specific area, discuss how the Postal Service could improve that data.
2. The Report states the Postal Service's "measurement of on-time delivery performance has expanded greatly over the past 9 years, but remains incomplete because only about 55 percent of market-dominant mail volume is currently included in measurement." Id. at 11 (footnote omitted). The Commission, however, has not concluded that the percentage of mail in measurement should be the primary determinant of accurate, reliable, or representative service performance data, instead focusing on sampling fractions, confidence intervals, and margins of error at the district level. Id. at 52-53. The Report asserts that for mail measured using a census-type approach, it is necessary to assess non-sampling error, which "would require determining whether the mail not included in measurement systematically differed from the mail included in the measurement, particularly regarding characteristics associated with on-time delivery." Id. at 35.
 - a. Accounting for product and service standard, discuss any systematic differences between mail in measurement and mail not in measurement that are likely to impact service performance.
 - b. Discuss whether and how non-sampling error might have a material impact on service performance results and actions the Postal Service could take to minimize non-sampling error.
3. The Report suggests that "[t]he main causes for incomplete measurement of bulk mail can be broadly grouped into two different reasons: (1) mailers not applying a unique Intelligent Mail barcode [IMb] to each mail piece to enable tracking (trackable barcodes) or (2) lack of needed information." Id. at 14-15 (footnote omitted).
 - a. Discuss specific actions the Postal Service should take to increase participation in the full-service IMb program.
 - b. Discuss specific actions the Postal Service needs to take to decrease the amount of mail excluded from measurement.

The Postal Service has reviewed GAO Report 15-756 and the comments submitted on December 14, 2015 by the Public Representative and jointly by the Association for Postal Commerce and the Major Mailers Association in response to Commission Order No. 2791. As directed by that Order, the Postal Service hereby responds to the parties' comments that address the above-enumerated issues.

I. Potential Deficiencies and Limitations in Data

A. Accuracy and Reliability

1. The Postal Service maintains high standards.

The current measurement system employs multiple methods to measure the transit-time for mail against service standards for reporting performance of the products. Different measurement methods are used based on the characteristics of the products and have been designed to provide accurate and reliable measures of performance. Accuracy is how close a measured value is to the actual (true) value; while reliability refers to how consistent measures are, under similar conditions. None of the measurements takes a complete census of the overall transit-time of the 150 billion plus pieces of mail processed by the Postal Service each year. Therefore, the true values of performance are unknown. Instead, as in most measurement processes, transit-time measures of performance are based upon a combination of statistical methods and measurement business rules to provide estimates of performance. Care is taken to keep measurement methods and rules consistent during a measurement period so that measures for the period are reliable. When changes do occur, information is provided so that the report reader understands what conditions changed.

For domestic and international First-Class Mail single-piece letters, cards, and flats, the current measurement systems employ test pieces which have been designed to represent characteristics of live mail using statistical methods to design the sample of test mail. The design uses estimates from the historical mail population about physical characteristics, and mail flows between ZIP Codes,

mailing patterns across days of week, combined with random sampling techniques to create a sampling plan for the quarter which uses a relatively small set of test pieces to estimate the performance of the population of mail. The end result, like all samples, is an estimate of performance from the population for which the true performance is unknown. The use of random sampling techniques allows the Postal Service to measure the sampling error and to adjust the sample sizes and other design factors over the life of the measurement system if the system does not produce the desired level of precision for the estimates produced. Such changes are not made frequently because generally the systems have produced estimates with the desired precision for nearly all districts each quarter.

The hybrid measurement methodology, which uses data collected from postal systems for the Processing Duration leg and data from an external contractor system using a panel of reporters to estimate the Last Mile, is used for measuring most commercial mail letters, cards, and flats. The method has also been designed to produce accurate and reliable measures of service performance for these products. Again, sampling methods are leveraged because the Last Mile service performance is measured for only a sample of pieces, not a census. Precision levels were targeted at plus-or-minus one percent for First-Class Mail letters and Standard Mail letters, and plus-or-minus two percent for Standard Mail flats with a 95 percent confidence level at the postal administrative District level.

For all products, the reports include descriptions of the measurement approach and outline limitations, describing gaps which have an impact or potential impact on measurement accuracy. For reports which have been subject to high

levels of variability in statistical precision across the required reporting categories, the reports include the margins of error.

2. The Postal Service conforms to modern practices.

At page 3 of their submission, the Joint Commenters recommend that the Postal Service and representatives of the mailing industry review existing service measurement business rules “with an eye toward how technology, system and mail preparation/entry have changed” since 2008, and “then conform the Start-the-Clock and Stop-the-Clock used to report service performance data to current practices.” As it happens, the Postal Service constantly reviews the service measurement business rules to, *inter alia*, assure that they are reasonably aligned with current technology and mail preparation requirements. The Service Performance Measurement (SPM) plan under review in Docket No. PI2015-1 reflects the Postal Service’s proposed approach to service performance measurement in light of current practices and technological progress since 2008. In the instant docket, the Joint Commenters specify several changes to service measurement business rules that they prefer to see promulgated.³ However, none appears to be related to technological and mail preparation/entry changes that have emerged since 2008. Accordingly, the Postal Service is challenged in its ability to respond substantively to the concern expressed in the paragraph that straddles pages 3-4 of the Joint Commenters’ submission.

Through the Mailers Technical Advisory Committee (MTAC), the Postal Service has briefed mailers and mail service providers that comprise the bulk mailing

³ See Joint Commenters at 3. These matters are addressed below in sections I.A.3 and I.A.4.

industry on multiple occasions regarding the Docket No. 2015-1 SPM plan that has been proposed for the future. The Postal Service is receptive to the prospect of continuing to discuss any specific concerns that the mailing industry might have with either the current measurement systems or the proposed SPM plan via MTAC, which has a long history as a forum for clarifying and/or resolving issues of mutual interest. Parties also have the opportunity to continue formal participation in Docket No. PI2015-1 and provide comment in accordance with procedures specified by the Commission.

3. An improved Start-the-Clock for DMU-verified mail is being developed.

At page 3 of their submission, the Joint Commenters propose a change in the designation of the Start-the-Clock event for bulk mail accepted at a Detached Mail Unit (DMU). Since the adoption of the current measurement systems, in the absence of a feasible method for reliable and consistent generation and transmission of acceptance data from DMUs that reflects trailer departure, the arrival of DMU mail at an origin postal facility within the supporting District⁴ is deemed to be the Start-the-Clock event for such mail. At the time that the current measurement systems were being established, the Postal Service conducted extensive discussions with the mailing industry on alternative methods for capturing detailed information on mail being loaded onto postal transportation at DMUs and such transportation departing from DMUs. Given limited staffing at those facilities and the desire to avoid delays in mail movement, it was deemed infeasible for either the

⁴ When the origin Processing & Distribution Center and the DMU are in the same postal administrative District or otherwise in close proximity.

Postal Service or the mail preparer to capture scan information on all containers at those locations and invest in costly technology to identify trailer departure. For this reason, which remains valid today, it was decided then to capture unload scans and to Start-the-clock on such mail at the entry facility when that facility was within the supporting District. In instances where postal transportation carries the mail from the DMU to a postal facility in another District, the mail is currently excluded from measurement.

Recognizing this to be less than ideal, the Postal Service has since sought a workable solution. As a result, the Postal Service can report that efforts are underway to build and pilot a mobile application that will allow mailers to capture nesting information⁵ and will allow the Postal Service to leverage global positioning system technology to record and transmit data regarding the departure of postal truckloads of mail from DMUs. In the future, with industry adoption, such information can serve as the basis for recording the Start-the-Clock event for DMU-entered mail.

4. Misperceptions persist about other service measurement business rules.

At page 3 of their submission, the Joint Commenters identify two additional perceived “issues/gaps . . . in existing [service performance measurement] business rules and practices for determining critical components of measurement[.]” The first relates to the Start-the-Clock event for mail drop-shipped at a Destination Sectional Center Facility (DSCF). The long-standing Start-the-Clock event has been the transport check-in of the truck containing the mail at the DSCF during its scheduled

⁵ Information pertinent to the aggregate handling units, such as containers or pallets, loaded into a trailer.

appointment window in the Facility Access and Shipment Tracking (FAST) system. In cases of unscheduled appointments and where an appointment is not recorded in FAST, the Start-the-Clock time is determined to be the unload scan time for a container. If a mailing with a scheduled appointment arrives so late that the appointment is deemed not to have been met, a “No Show” is recorded and Start-the-Clock is determined by container unload scan time. At page 3, the Joint Commenters assert that “there is no accurate collection of the truck arrival time at DSCFs and DDU [Destination Delivery Units]” and that “there are often disputes between the USPS and industry over actual arrival times versus the time the postal facility unloads the mail.” Disputes over actual arrival time versus unload start time do occur, but are not relevant to the issue at hand. In the absence of alternative data sources, the Postal Service believes the current approach -- relying primarily on FAST appointment time and secondarily on unload start time or scan time -- is appropriate. In those cases where both data are available and mailers have associated containers to their FAST appointment, the appointment arrival time is used, if arrival is on time. If the truck is determined to have arrived late or the mailer failed to associate their containers to the FAST appointment, the unload scan time would Start-the-Clock. This accounts for potential delays in unloading the mail in the service calculation.

In the third bullet on page 3 of their submission, the Joint Commenters express concern about multi-stop drop-ship mailings. Under such arrangements, a truckload of mail is partially off-loaded and accepted at one postal facility, and the remainder of the mail is unloaded and accepted at one or more additional postal

facilities. In cases where the truck “gets held up at the first USPS facility of the drop,” the Joint Commenters assert that all subsequent stops “should have the Critical Entry Time (CET) of the original appointment[.]” *Id.* at 3. In other words, a late arrival at a subsequent stop should be treated as if it arrived on time for its scheduled FAST appointment for purposes of calculating Start-the-Clock, if the mailer deems the delay to be the fault of the Postal Service. The current system works this way. If a multi-stop appointment is set up and is delayed by the Postal Service at a stop,⁶ subsequent stops will have their Start-the-Clock calculated using the scheduled appointment rather than the actual arrival or the unload scan.

5. There is no basis for insisting on “definitive” data.

The instant docket is a by-product of the fact that service performance measurement systems routinely scrutinized by the Commission and subject to audit by the United States Postal Service Office of Inspector General were also examined by the GAO in response to a Congressional oversight inquiry. At page 2 of their submission, the Joint Commenters express the concern that “there is no way to definitively determine the accuracy of service performance measurement data.” As the September 11, 2015 letter from the Postal Regulatory Commission to the Government Accountability Office regarding GAO Report 15-756 makes clear, there is a compelling basis for disagreement with the GAO’s assessment of service

⁶ For instance, when the unload time exceeds the standard published for the mail in section 6.3 of USPS Publication 804, *Drop Shipment Procedures for Destination Entry* (October 2013). See <http://about.usps.com/publications/pub804.pdf><http://about.usps.com/publications/pub804.pdf>.

performance reporting and oversight.⁷ It is unclear what, in the view of the Joint Commenters, would constitute “definitive” service performance data for purposes of the Postal Service and the Commission fulfilling their respective reporting and evaluation responsibilities under 39 U.S.C. §§ 3652 and 3653.⁸

Service performance scores will never be based on census data reflecting the experience of each and every mailpiece within a product grouping being measured. Differences in mailer capability and/or willingness to affix barcodes to mailpieces, imperfect scanning by postal mail processing equipment and employees, degradation of barcodes on pieces in the mailstream, the failure of mail to meet technical preparation requirements at entry, and other factors make it certain that some portion of the volume for each mail product will not generate data usable for measuring service performance. Every service performance measurement system that relies on less than perfect methods or less than complete data is subject to the criticism that it fails to generate the most reliable data conceivable and, therefore, is not sufficiently “definitive.”

The Commission’s regulations governing the nature and quality of service performance data to be reported by the Postal Service are published at 39 C.F.R. Part 3055. There is no basis for the implication that “definitive” data or measurement systems are necessary for the Commission’s annual 39 U.S.C. § 3653

⁷ See also, the September 11, 2015 letter from the Postal Service to the GAO. Both letters are appended to the GAO Report 15-756, which accompanies Order No. 2791.

⁸ At pages 5-6 of their submission, the Joint Commenters provide a veritable wish list of data they suggest should be provided to the Commission. However, that list is premised upon an invitation for the Commission to disregard the statutory primacy of postal management to oversee and manage local postal operations.

determination of whether market-dominant product service standards are being met.

This conclusion seems more compelling when one considers the section

3652(e)(1)(B) directive that the Commission not impose “unwarranted or

unnecessary administrative effort and expense on the part of the Postal Service[.]”

6. The Commission should move forward, not backward.

In light of the current absence of “definitive” Postal Service generated performance data, the Joint Commenters invite the Commission to:

explore ways to periodically compare service performance measurement compiled by individual mailers or service providers with USPS service performance measurement of like time period, and geography to ensure the results are consistent.

Joint Commenters at 2. The Postal Service encourages the Commission to decline this invitation.

As the Commission will recall, when the current Periodicals service performance measurement system was in the earliest stages of development, mailer adoption of Intelligent Mail barcode technology necessary for the generation of performance data was sluggish. The dearth of its own Periodicals service data led the Postal Service initially to present service performance reports based on data that originated from two mailer/service provider-operated measurement systems. Docket No. PI2008-1, PRC Order No. 140, at 26-27. Postal Service reporting of IMb-based Periodicals service performance data commenced with quarter 1 of fiscal year 2012. The absence of postal data in the early years of annual compliance review may have justified reliance on service performance data that originated from mailer/service provider-operated measurement systems; however, those circumstances are not relevant today. Reverting to such an approach and comparing current postal data to

various sets of mailer/service provider generated data until such time that every postal customer agrees that postal data are “definitive” seems more like two steps backward rather than a step forward. There are likely to be variations in Start/Stop-the Clock rules, data exclusion policies, representativeness of samples collected, as well as entry and delivery characteristics of individual mailings measured by multiple imperfectly aligned mailer/service provider measurement systems. Such differences also are likely to exist between those systems and the Postal Service measurement system. Assessing service performance on the basis of a comparison of all such measurement systems would likely add anything except clarity to the Commission’s current service measurement evaluation process.

Alternatively, the Postal Service suggests that the Commission, the Postal Service and interested parties work together to explore opportunities for feasible improvements in Periodicals and other postal product service performance data that reduce concern about whether those data are sufficiently accurate and reliable to provide a basis for the Commission to complete its section 3653(b)(2) mission. In this regard, the Postal Service considers Docket No. PI2015-1 to be an appropriate forum for such activity, as the Commission considers the Postal Service’s request for approval of a migration to internal measurement.

7. Clarity about future system monitoring is in order.

While expressing concern about postal-generated service performance data not being sufficiently “definitive,” the Joint Commenters indicate interest in the opportunity to review and comment on any audit plan the Postal Service may submit in connection with the proposed Service Performance Measurement (SPM) plan in

concurrent Docket No. PI2015-1. Joint Commenters at 2. Accordingly, the Postal Service invites the attention of the Joint Commenters to its revised response in that docket to Question 4 of Chairman's Information Request No. 3 (October 7, 2015) for the most recent information regarding the Postal Service's plans for ensuring the integrity of its proposed SPM plan.

8. The Public Representative offers recommendations that are beyond the scope of this docket.

At page 9 of its Comments, the Public Representative recommends that the Postal Service provide up-to-date descriptions of the methodologies it uses to ensure accuracy, including its own accuracy-related indicators. In addition, the Public Representative states that the Postal Service should provide "more transparent information" and explanations of different margins of error that are reported for disaggregated quarterly postal administrative District data. The Public Representative does not allege here any failure on the part of the Postal Service to provide data or explanatory information required by the Commission's rules, only a failure to provide additional information that the Public Representative would find useful for a better understanding of the data provided.

To assist in its annual compliance determination, the Commission is authorized to establish such reporting requirements as it deems necessary to fulfill its responsibilities, subject to the constraint that they not be unwarranted or unnecessary within the meaning of 39 U.S.C. § 3652(e)(1)(B). The Postal Service strives in good faith to comply with all current requirements. At such time that the Commission formally proposes specific changes to the requirements in 39 C.F.R. Parts 3055.2 and 3055.32 -- for the current measurement systems or the proposed

system concurrently under review in Docket No. PI2015-1-- for the purpose of expanding explanatory material accompanying data in quarterly service performance reports, the Postal Service will offer comments on any such proposals. Meanwhile, the Postal Service will focus its comments in the instant docket on the enumerated issues specified in PRC Order No. 2671.

B. Representativeness

1. Some perspective is in order.

Postal Service management has long had the sole responsibility for operating the national postal system as a basic and fundamental service to the people under 39 U.S.C. § 101(a), and for satisfying a host of other service, financial management, and operational objectives in accordance with various policies of Title 39 U.S.C. *See, generally,* sections 101, 401, 403 and 404.

Since its enactment at the end of 2006, section 3652(a)(1) has required the Postal Service to annually report to the Commission in sufficient detail to demonstrate whether each market-dominant product during the year complied with applicable statutory requirements. Concurrently, section 3653(b)(2) also requires the Commission to make annual written determinations of whether the level of service for each market-dominant product complied with any service standards in effect. In exercising its authority to determine what data constitute “sufficient detail” for these purposes, the Commission has considered the restraints imposed by section 3652(e)(1)(B) and implemented regulations reflecting numerous service performance reporting requirements with which the Postal Service must comply. *See* 39 C.F.R. Part 3055. These regulations have significantly increased the

amount of service performance data that the Postal Service previously collected.

These more robust service quality data contribute to the wealth of existing operational, financial, service and other data utilized daily by postal management at every level of the organization to pursue the above-referenced statutory policies and objectives.

The Joint Commenters appear to have a skewed perception of the role that current service performance data serve. At page 1 of their submission, they express the view that:

the main purpose of the USPS' service performance measurement and reporting system should be to drive improvement and ensure that Market Dominant mail categories receive the level of service paid for the price of mail.

It is beyond dispute that the requirements of 39 C.F.R. Part 3055 have resulted in the production of more robust service performance data for (what are now deemed market-dominant products) than were being generated before the enactment of the Postal Accountability and Enhancement Act into law. However, the above-referenced service, operational, financial policies alluded to by the Joint Commenters are embedded in various provisions of Title 39 U.S.C. that predate the service measurement and reporting obligations established under sections 3652 and 3653. Accordingly, for decades, the Postal Service has generated considerable operational data, including some service data, to inform its pursuit of the long-standing service, operational, and financial policies and policies of Title 39.

The service performance data generated by the Postal Service for the Commission comprise a sliver of the vast array of operational data that inform postal management in its pursuit of long-term policy objectives, and in implementing the

day-to-day service and operational decisions in mail acceptance, processing, transportation, and delivery. Irrespective of any Commission oversight, these data help postal management to take such action as may be necessary to diagnose operational shortcomings and mail preparation deficiencies, to collaborate with customers in pursuing opportunities for improvement, and to maintain adequate service in an efficient manner -- or, as the Joint Commenters put it -- to ensure that customers “receive the level of service paid for the price of mail.”

It is not the intent here to minimize the positive impact that service performance data generated for the Commission have on the ability of postal management to fulfill its statutory responsibilities. In responding to the rhetoric of the Joint Commenters, the Postal Service merely seeks to ensure that the purposes and role of such data are not overstated, and the separate and distinct roles of postal management and the Commission are not overlooked or blurred.

2. Data granularity should reflect the Commission’s needs and the burden to the Postal Service.

a. Representation of specific mailers’ experiences is not necessary to annual compliance review.

At page 4 of their submission, the Joint Commenters express the concern that service performance data currently reported by the Postal Service “are not representative of the products or experience of particular mailers or groups of mailers.” Perfectly representative data for each product would be ideal. Whether they can be generated and should be mandated requires consideration of what constitutes “sufficient detail” within the meaning of section 3652(a)(1) and the need to avoid “unnecessary or unwarranted administrative effort and expense” as

mandated by section 3652(e)(1)(B). The Joint Commenters are silent on both issues as they unleash a flood of suggestions that the Commission impose substantial additional service measurement and reporting burdens on the Postal Service.

The goal of a service measurement system for a particular product is to provide sufficient detail for the Commission to broadly assess the general quality of service afforded that product. A national aggregate score is based on the service provided to a broad spectrum of mail generated by a diverse base of users of that product across the measurement time period. Different factors lead to local variations among the multitude of data points that contribute all the plusses and minuses to a national aggregate performance score. Accordingly, it should come as no surprise that specific mailers may consider that their individual experience -- for better or for worse -- is at variance with the aggregate service quality score reported for a product they use. However, the measurement system data reported to the Commission are not required or intended to reflect the experiences of specific customers and are not represented as such.

b. Geographical representativeness is being achieved.

Again at page 4, the Joint Commenters suggest that performance data reported for each product under 39 C.F.R. Part 3055 should “be representative of . . . mail in a specific geographic area[.]” Market-dominant product service performance measurement results are based on data generated by the acceptance and delivery of mail in nearly every 3-digit ZIP Code area within the postal network. Bulk mailers can see their service reflected as part of the overall on-time scores for the products they use.

The lament of the Joint Commenters about a lack of geographic representativeness in service performance data seems to overlook the fact that quarterly First-Class Mail, Standard Mail and Package Services data reported to the Commission also are disaggregated at the District and Postal Administrative Area level. See, 39 C.F.R. at Parts 3055.45, 3055.55 and 3055.60. Likewise, Periodicals data and Single-Piece First-Class Mail International data are reported to the Commission at the Area level. *Id.* at Part 3055.55.

The Joint Commenters do not define the alternative nature of “geographic representativeness” that they desire or present a basis for concluding that the current geographical disaggregation of data is inadequate for purposes of the Commission’s annual compliance determination. Current data may not be sufficiently “definitive” to suit the Joint Commenters and, again, may be at variance with the experience of some of their respective associations’ members. However, they provide additional insight for the benefit of the Commission’s compliance review and add to the wealth of data otherwise utilized by postal management to pinpoint and diagnose specific opportunities to improve operations and service.

c. Local operational performance is the responsibility of postal management.

At page 4, the Joint Commenters suggest that additional service performance data should be generated for “geographical areas and facilities that are consistently low performing.” Here, the Joint Commenters appear to be confused about the respective roles of Postal Service management and the Postal Regulatory Commission. Network management and individual mail facility performance are among the responsibilities solely within the responsibility of postal management.

They are not matters within the jurisdiction of the Commission to oversee or attempt to improve or equalize. Postal management uses numerous tools to gather data about its processing and transportation networks, applies various metrics to specific operations and facilities, monitors performance to continuously identify opportunities for improvement, and to meet various self-imposed operational and service goals, and implements necessary operational changes. Constant examination of service performance data is a part of that process, notwithstanding the section 3652 obligation to provide service performance data to the Commission.

d. Different methods of entry and processing do not warrant additional measurement and reporting.

The Postal Service acknowledges that mail within a given product can enter the mailstream through a variety of acceptance methods. When an entry method permits feasible generation of sufficiently reliable Start-the-Clock data, mail entered in that manner should contribute to service calculations. The Joint Commenters raise the point that reporting product data on an aggregate basis does not reveal whether there is any variation in performance that may exist based on different methods by which mailpieces within a product are accepted. True as that may be, the data reporting obligations in 39 C.F.R. Part 3055 are in harmony with the general nature of the Commission's section 3653 obligation to assess service standard compliance for a product on an aggregate basis.

Nevertheless, the Joint Commenters propose changes in service measurement and reporting for the purpose of comparing differences within a product based on such factors as whether:

- flats are processed on Flat Sequencing System equipment (page 5),

- IMb mail qualifies for a particular workshare category or mailflow (*id.* at 5);
- mailpieces are redirected to a new delivery address during processing via the newly automated Redirected-IMb process, which accesses change-of-address data during mail processing (*id.*);
- undeliverable-as-addressed mail is forwarded or returned (*id.*);
- mail is processed through highly automated low-touch mailflows vs. more complex, high-touch flows with more postal handling operations (page 6); or
- mailflows involve postal-managed transportation vs. mailer-based drop-ship transportation (*id.*).

Pressing onward, the Joint Commenters' posit that more granular transportation mode-based reporting per product to the Commission could provide a basis for "future discussion of less generic service standards by class and more product specific service standards . . . that marketers can actually rely on." And again at page 6, the Joint Commenters fault the current measurement and reporting scheme for not reflecting "the performance of all areas of mail."

On the issue of undeliverable-as-addressed (UAA) mail, it is common sense that the Postal Service should not be expected to deliver mail with an incomplete, inaccurate, or not current address to its final destination within the same time frame as properly prepared and addressed mail. From the earliest days of EXFC until now, the properly prepared and addressed mailpiece has been the target of service performance measurement and reporting. UAA mail requires additional time and effort, frequently involving manual operations, to determine the correct address and apply that information to the mailpiece so that it can be reintroduced into the normal mailstream. The Postal Service provides a variety of tools and services to assist

mailers and recipients with maintaining current and accurate address information to support timely delivery for all mail products.

The Joint Commenters' proposal that UAA mail be measured is not novel. As the Commission will recall, the feasibility of forwarded and returned mail measurement was examined by the Postal Service in Docket No. RM2009-11 and was the subject of a report filed in that docket on December 10, 2009.⁹ The Postal Service has not undertaken to update the cost estimates presented in that report. However, given the absence of any material change in the nature of First-Class Mail processing and measurement since then, the hurdles to development of a feasible measurement system or study methodology that are identified in that report still remain. Reducing the volume of UAA mail and minimizing the transit time and cost associated with delivery of such mail is of mutual interest to and requires the continued joint efforts of the Postal Service the mailing industry.

The statutory scheme does not require the Commission to assess whether and to what degree every known variation in the handling of mail affects the service performance for mail within a particular product. Service performance reporting under sections 3652 and 3653 should not be expanded simply to accommodate mailers requesting the imposition of reporting requirements that exceed the needs of the Commission as a pretext for access to postal data. Attempting to develop statistically valid measures for all of the different mail acceptance, processing and transportation variables identified by the Joint Commenters would require orders of

⁹ See <http://www.prc.gov/docs/66/66012/12.10.Mot.Include.Supplmnt.Report.pdf>.

magnitude increases in current and proposed service measurement data collection to develop reports that would be statistically reliable.

The Joint Commenters propose that the Postal Service be required by the Commission to periodically report service performance data publicly with such granularity as to promote opportunities for mailers to discuss with postal management potential service standard changes. However, no statutory basis can be found for imposing such a service measurement and reporting obligation. Moreover, the subject of this docket is not whether or why current service standards might be changed or be made more appealing to some mailers. Postal management has sole responsibility for managing its human and capital resources, and in the absence of a specific statutory mandate, broad discretion to determine what service standards to establish for its numerous mail products. When it considers that market-dominant mail product service standard changes are in order, postal management may unilaterally amend its 39 C.F.R. Part 121 service standards by notice-and-comment rulemaking. If a change in the nature of service is of such magnitude as to be substantially nationwide in its impact and scope, the Postal Service is required to give the Commission a reasonable opportunity to offer a non-binding advisory opinion regarding the change before implementing it. See 39 U.S.C. 3661. The statutory scheme gives postal management broad latitude to determine whether to pursue any such service standard changes; it limits the Commission's involvement to that of an advisor, and its advisory role to the window of time between postal management's development of a service change concept and its scheduled implementation. The Postal Service invites the attention of the

Joint Commenters to the Commission's observation that the business needs or preferences of some mailers may vastly exceed the needs of the regulator to perform its functions. See PRC Order No. 140 at 42.

e. No need for day-of-entry reporting exists.

At page 6, the Joint Commenters propose that service performance for Destination Sectional Center Facility (DSCF) Standard Mail¹⁰ be reported in a manner that separately reflects the on-time percentage for mail based on whether the applicable service standard reflects a one-day extension triggered by the day of the week the mail is entered. Such granularity in reporting would be unprecedented. The Joint Commenters argue that this more granular reporting would allow mailers to better plan entry and delivery of their DSCF Standard Mail. But such a rationale could justify granting every imaginable request for more granular service performance data for every product, irrespective of any variation in service standard based on day of entry. The Joint Commenters' admission of the basis for their request confirms that it is intended to serve the internal business planning needs of some members of their respective trade associations, not the purposes of the Commission's responsibilities.

The mailing industry has long experience with calculating service standards by entry day to compensate for the impact of Sundays and federal holidays in calculating on-time performance for mail. The Postal Service sees no reason for special reporting in terms of entry day for DSCF Standard Mail. Individual mailers

¹⁰ For which the service standard generally is extended by one day for load leveling purposes if the mail is entered on a Friday or Saturday. See 39 C.F.R. Parts 121.3(b)(2) and (3).

interested in understanding the impact that load-leveling could have on the delivery of their mail can use the Intelligent Mail Barcode Planning Tool¹¹ to make plans on the basis of their unique requirements. It bears emphasizing that attempting to develop statistically valid measures for every possible variation in service performance that might be of interest to a small number of mailers is unduly burdensome on the Postal Service and the mailing industry as a whole, which inevitably would bear the cost of an expansion of the measurement system to accommodate very narrow private interests.

f. Valuable bundle tracking data are available to IMb mailers outside of the ACR process.

At the bottom of page 6 of their submission, the Joint Commenters appear to allude to Postal Service's Informed Visibility initiative to start providing Full Service IMb mailers with Bundle Tracking data pertinent to their mailings. Bundle Tracking is designed to address bulk mailers' preferences for information on bundles and associated/nested mailpieces for use in analyzing their own service experiences. This level of granularity exceeds the needs of the Commission's annual compliance review process; however, Bundle Tracking also has the benefit of including mailings in service performance measurement that bypass all automation, such as full Carrier Route pallets cross-docked or entered directly at a Delivery Unit. Bundle Tracking also improves visibility of mail for which automation processing stops at Package

¹¹ See https://ribbs.usps.gov/imb_planning_tool. This tool is useful to a broad spectrum of bulk mailers, including senders of DSCF Standard Mail. To foster greater understanding of its benefits, the Postal Service invites bulk mailers to continue to directly share their feedback regarding use of the tool to-date and to communicate interest in additional tutorials before and during future MTAC and National Postal Forum meetings.

Sorters used to separate bundles of flats, giving greater insight on mail movement closer to final delivery.

The Informed Visibility program generates other mailing-specific data of value for Full Service IMb mailers that far exceed the needs of the Commission's annual service performance compliance review. Bundle Tracking is one example. The Postal Service will continue to work with the mailing industry to leverage IMb data in a manner that improves its ability to provide the level of service that mailers should expect and that preserves the value of mail as an effective mode of communication.

II. Concern Over Non-Sampling Error

At pages 6-7 of their submission, the Joint Commenters address the issue of non-sampling error, as does the Public Representative at pages 13-17. The Postal Service offers its responsive comments below.

As a general matter, the Postal Service observes that although it is not possible to calculate the impact of non-sampling error, the current measurement systems have been designed to identify potential sources of non-sampling error and control for them when feasible. Further, the Postal Service routinely identifies measurement limitations in the reporting descriptions. These descriptions are intended to help the Commission and others better understand the measurement processes, methodologies, coverage, and limitations.

One source of non-sampling error identified by the Public Representative at page 14 of his Comments is geographical undercoverage. While the Postal Service acknowledges that measuring mail to every ZIP Code area would be ideal, the

additional costs involved in such an effort exceeds the value, given the complexity of measurement to these locations and compounded by limited delivery points and small mail volumes. Beginning in fiscal year FY 2009, the Postal Service expanded the service measurement systems to virtually all 3-digit ZIP Code areas. Decisions to exclude a small number of 3-digit ZIP Code areas were based on the characteristics of the mail collection and delivery within each of those ZIP Code areas and in consideration of the capabilities of the measurement system. For example, the decision was made to exclude 3-digit ZIP Code areas representing United States military operations outside of the 50 states for which originating and destinating mail operations are conducted, not by the United States Postal Service, but under the direction of the Military Postal Service Agency in accordance with 39 U.S.C. § 406. The decision to exclude 3-digit ZIP Codes exclusively designated for other government entities (e.g., the Internal Revenue Service) was made in recognition that accurate measurement of mail to these locations was impractical given the high volumes of mail delivered to these locations on a given day. Incoming mail at these destinations would generally be handled by a third-party mail intake operation. The limits on access to their operations make it difficult to accurately ascertain delivery date information without significant cost and effort on the part of the receiving agency and/or the Postal Service. Otherwise, the few remaining ZIP Code area exclusions relate to locations where there are few or no eligible collection boxes, or so few delivery points as to make it infeasible to find participants to serve as mail receiving reporters for the measurement process. Collectively, the excluded 3-digit ZIP Codes represented approximately 0.3 percent

of total First-Class Mail volume in FY 2015, based upon the data from the Origin Destination Information System (ODIS). The lack of representation of these ZIP Code areas has very limited impact on the accuracy of measurement overall given the very small proportion of total population specifically excluded from measurement¹²

While some ZIP Codes have been specifically excluded from measurement, the Postal Service also monitors whether all of the ZIP Codes eligible for inclusion have volume represented in measurement and whether each postal administrative District has both originating and destinating mail in measurement each expected delivery day of a fiscal quarter. The constant monitoring of these statistics allows the Postal Service to identify gaps in geographic coverage during each fiscal quarter that could have an impact on the representativeness of the results and to provide information in the “Limitations” section of the quarterly reports describing any significant gaps that were observed. In situations where the available data are deemed highly unrepresentative, results are withheld altogether by the external contractor employed by the Postal Service and reported as not available, irrespective of the implied performance scores.

At pages 7 and 8, the Joint Commenters state that differences in service performance between the categories included in service performance measurement and some types of mail not included in measurement at all are less transparent and identify non-barcoded/nonmachinable mail as an example of mail not currently

¹² As the Public Representative acknowledges at page 14 of his Comments, the proposed internal measurement system will further reduce the number of excluded ZIP Codes.

represented in measurement. The Joint Commenters suggest the establishment of procedures to periodically measure the service performance of the currently non-measured mailstream. Leaving mail out of measurement is less than ideal. However, the costs involved in developing measurement approaches for every possible segment of mail and ensuring the accuracy of each approach and developing methods for combining results to provide valid estimates of overall product performance must be considered in evaluating the reasonableness of the exclusions. For the non-barcoded/nonmachinable mail example, measurement methods involving radio frequency identification (RFID) and/or test pieces would likely be required, since measurement requires a way to track a unique piece of mail from postal acceptance to delivery. While it is possible to envision such an approach, the costs involved in designing the study to represent all relevant characteristics, engage mailers to participate, and operate the study would be very large. Instead, the Postal Service recommends identifying the non-measured segments, quantifying the percentage of mail within the product category represented, and focusing on working to identify methods for measurement for the unmeasured segments likely to have a material impact on interpretation of the overall service performance results. Segments representing a very small percent, say one percent, of the overall product category, cannot influence the overall product performance score significantly. In the most extreme (and unlikely) case, in which 100 percent of the measured mail was delivered on-time and none of the unmeasured mail was delivered on-time, the difference between a performance score of 100 percent on-time and one of 99 percent on-time, if the remaining one

percent were measured, is fairly immaterial to the interpretation of performance for the product overall. The Postal Service has been continuously focused on getting more mail into measurement through the efforts described in Section III of this document with efforts such as developing approaches to measure Destination Delivery Unit-entry Saturation Mail and Every-Door-Direct Mail-Retail, for example.

In addition to examining the data to identify gaps in representation, the current IMb-based measurement system has adjustment processes in place to reduce potential measurement bias through the use of weighting adjustments and imputation procedures. Weighting adjustments are applied within the measurement systems to correct for underrepresentation or overrepresentation of certain characteristics which influence service performance. As an example, for quarter 4 of FY 2015, the proportion of Outside County Periodicals entered End-to-End (without Destination Entry discount) in the measured mail population was 16.5 percent of total measured mail, compared with the estimated population total of 23.5 percent. Without adjustment, the overall Periodicals measurement score would underrepresent the performance of End-to-End mail, resulting in higher measurement scores. The weighting adjustments are made to reduce measurement bias. Information about the adjustments is included in the reporting descriptions and/or displayed in the aggregation detail sheets included in each quarterly service performance reports. Imputation is the process of replacing missing values with substituted values and represents another way to address non-sampling errors. The Postal Service uses imputation processes to address certain situations where data obtained from the measurement process are completely missing or too limited to be

reliable, and a reliable substitute value is available. As an example, in estimating Last Mile profiles, if data are not sufficient for a certain sampling group at the District level, the corresponding value for the postal Area is substituted so that the service measurement score for the District can still be reported.

By examining the characteristics of the measured mail and comparing with available mail population data, information about the potential non-sampling errors are gathered and assessed for potential impact. The current measurement systems have been designed to provide a basis for regular analyses of measured mail characteristics against similar characteristics information about the entire population available from the Postal Service's Revenue-Pieces-Weights reports and the Origin-Destination Information System (ODIS). The Postal Service is focused on continually working to reduce systematic errors¹³ or to include adjustments when issues are identified.

At pages 16-17 of his comments, the Public Representative invites attention to Docket No. PI2015-1, and page 5 of the USPS Statistical Design Plan (August 25, 2015) to draw attention to the Postal Service's proposed internal service performance measurement system currently under review in that docket. The Public Representative focuses on the planned expansion of the measurement of Single-Piece First-Class Mail beyond collection mail (as currently measured by the External First-Class Mail system) to include Certified Single-Piece First-Class Mail accepted at postal retail windows. The Public Representative expresses concern

¹³ Errors that would distort service performance estimates due to the underrepresentation of segments of the population. They are not to be confused with random errors, which can distort the results in any given direction but tend to balance out on average.

that the use of these accountable pieces as part of First Mile measurement in the proposed internal measurement system may be inadequate to represent mail accepted at retail because they are not the product of random sampling. The concern expressed in the instant docket by the Public Representative appears to have been addressed to a large degree by the explanation in the Postal Service's Docket No. PI2015-1 response to Question 11(b) of Chairman's Information Request No. 4 (December 3, 2015). The Postal Service assumes that it is the Commission's intent to resolve issues germane to that proceeding in that docket. Accordingly, while some parties may be anxious to address specific Docket No. PI2015-1 issues before the Commission solicits comments on those issues in that docket, the Postal Service will refrain from conflating the concurrent dockets and addressing the merits of the proposed internal measurement system in the instant docket.

III. Completeness of Bulk Mail Measurement and Intelligent Mail Barcodes.

A. The Postal Service is increasing IMb participation.

The participation of eligible commercial mailers in the Full Service IMb program is at the very foundation of improved service performance measurement for the mail that they generate. The Attachment to these reply comments reflects a graphic depiction of the steady increase in eligible commercial mail volume participation in the Full-Service IMb program since the beginning of fiscal year 2013. It shows that as of December 2015, 88 percent of eligible commercial volume is presented to the Postal Service as Full-Service IMb mail. To address the 12 percent of eligible volume not presented as Full-Service IMb mail, the Postal Service

continues to educate mailers and mail service providers about the program's benefits, and to inform its employee about how to identify and pursue opportunities to help eligible mailers convert. Over time, these efforts should generate an even more robust basis for service performance measurement.

As the use of Full-Service IMb has increased since implementation in 2008, the Postal Service is aligning product offerings and programs to require the use of Full-Service IMb. The Postal Service continues to engage the mailing industry to provide mailers with both high-level and long-term goals for mailers to use as a foundation as their mailing operations change. Specifically, the *Mail Entry Roadmap*¹⁴ is available through the publicly accessible Postal Service Rapid Information Bulletin Board (RIBBS) and describes in detail the Postal Service's key initiatives in the transformation of mail acceptance and induction with Full-Service IMb as the foundation for participation. Various fact sheets and guides explaining the benefits of Full-Service Intelligent Mail barcodes are available on RIBBS for commercial mailers and mail service providers.¹⁵

Other tools providing ease-of-use capabilities have been developed to assist small-to-medium volume mailers seeking to become Full-Service IMb users. The Intelligent Mail Small Business tool is available for small-to-medium generators of relatively simple mailings who do not need to take advantage of vendor-supplied software more suitable for larger, complex mailings. Each postal administrative District has an "ambassador" who promotes the tool and provides assistance to

¹⁴ See https://ribbs.usps.gov/intelligentmail_latestnews/documents/tech_guides/MailEntryRoadmap.pdf.

¹⁵ See <https://ribbs.usps.gov/index.cfm?page=intelligentmailservices>.

customers to supplement the expertise of local postal business mail acceptance employees. These employees receive continuous training and have ready access to information on Full-Service IMb. Each postal administrative District is given periodic information regarding local mailer IMb adoption and assistance in helping mailers convert to Full-Service IMb.

In addition, working with software vendors and mail service providers, the Postal Service developed a Full-Service certification program. This program allows software vendors and service providers to test their various products and services to ensure they meet Postal Service standards. A list of certified vendors and service providers is publicly accessible via RIBBS.¹⁶ This allows mailers access to information that identifies vendors or service providers capable of helping them become Full-Service IMb mailers.

At page 10 of their submission, the Joint Commenters assert that increased pricing incentives “would likely encourage more mailers to send eligible mail as Full Service” and then propose the establishment of “an enhanced discount based on cost and service performance differentials between Full Service compliant and non-automation mail[.]” Any future effort by the Postal Service to adjust prices related to Full-Service IMb participation must consider the extent of the cost and service performance differentials, and whether increased incentives would be effective in increasing participation by the relatively small volume of mail that has not already adopted Full-Service IMb. Of necessity, the Postal Service also must consider PRC Order No. 3047 in Docket No. R2013-10R (January 22, 2016), which responds to

¹⁶ See, <https://ribbs.usps.gov/index.cfm?page=electronicdoc>.

the remand in *United States Postal Service vs. Postal Regulatory Commission*, 785 F.3d 740 (D.C. Cir. 2015). That Order reflects the Commission's attempt to clarify the standards to be used when a mail preparation change would have a rate effect with price cap implications. The Postal Service will give the Order and the Joint Commenters' proposal all due consideration as it contemplates future pertinent price changes.

B. The Postal Service is committed to reducing data exclusions.

It is the goal of the Postal Service to measure as much mail as is feasibly possible. However, it is imperative that bulk mail included in service performance measurement has the necessary quality of physical characteristics and electronic documentation (eDoc) to ensure accurate service calculations. If mail is not properly prepared or documented, either no calculation can be made or the results of the calculations may be inaccurate and have an adverse impact on service performance scores. At the same time, given the varying capabilities and needs of the diverse mailing community that uses the national postal system, it is not realistic to assume that the mailstream can ever evolve to a point where every piece can meet the physical and technical specifications necessary to generate reliable and accurate service performance measurement data. Accordingly, the need for data exclusions will always persist.

Data recording errors exist where the information provided in a mailer's electronic documentation is inconsistent with data recorded by the Postal Service, creating uncertainty that would impact measurement accuracy. For example, mailers occasionally provide information about the scheduled ship date for a mailing

which differs by several days from the postage statement finalization. In such a case, if there is no definitive information to validate exactly when the mail was accepted by the Postal Service, the mail is excluded from measurement due to the uncertainty about the Start-the-Clock event. Similarly, occasionally there are issues where the scan dates and times on mailpieces are in conflict with electronic documentation information about those pieces. Accordingly, for example, a mailpiece is excluded from measurement when the scan date and time captured from postal mail processing equipment are earlier than the actual Start-the-Clock date and time of the container in which the piece was reported to reside. Another example is a situation where the entry location of the piece in electronic documentation is inconsistent with the verification facility, leading to uncertainty about the correct entry location and assignment of service standards.

A mail preparation issue which would impact measurement accuracy would be the lack of unique barcodes on containers or mailpieces. If a mailer, unintentionally or otherwise, fails to use unique barcodes, there is no way to associate barcode scans with the correct piece of mail. Similarly, if the Postal Service identifies mail preparation issues in the verification process which exceed allowable quality thresholds, the mail is excluded from measurement for improper preparation.

Sometimes, mailers provide containers of mail at the wrong facility for the price differential or discount being claimed. Since service standards are driven by the entry discount location, such situations would lead to inaccurate measures of performance if the pieces were included in measurement.

Under the direction of its Vice President, the Postal Service Headquarters office of Mail Entry and Payment Technology works with the bulk mailing industry to help reduce the proportion of volume that ends up being excluded from measurement. As recently as 2013, when mail preparation errors were identified, all of a mailer's volume would be excluded from measurement until the deficiencies were corrected. In the current Intelligent Mail barcode environment, the Postal Service no longer excludes an entire mailer. Exclusions can now be completed to either the container or tray identified as the source of a data deficiency or error. In 2015, the Postal Service reviewed all cases in which a mailer was disqualified from participation in service measurement. The office of Mail Entry and Payment Technology has worked with postal Area and District personnel as appropriate and has placed 16 formerly disqualified high-volume IMb mailers back into measurement that were previously excluded entirely. This has shifted a significant volume of mail back into measurement and allowed for narrowing exclusions to either the affected mail tray or other handling unit.

Last year, Postal Service and mailing industry representatives of MTAC Workgroup 167 focused on having the Postal Service refresh the industry's understanding of applicable measurement exclusions and explored solutions for reducing them. When Workgroup 167 concluded its efforts in May 2015, it did so after affirming the importance of Mail Visibility to the Postal Service, mailers and mail service providers. The Workgroup reinforced the need for timely ongoing communication as mailing issues arise so that the Postal Service and mailers could close gaps in service performance measurement. There was consensus that

visibility of mailing-specific data would enhance the ability of the Postal Service and the mailing industry to develop a robust understanding of issues and where to focus resources and efforts that will keep mail in measurement.

As a result, the Postal Service has developed a Service Performance Measurement Fact Sheet to help mailers identify errors and to follow suggestions for resolving those errors.¹⁷ Quarterly webinars are being scheduled with the mailing industry to review the most common causes for exclusion of mail from measurement, in order to help reduce their occurrence in the future. Currently, the office of Mail Entry and Payment Technology is working with high-volume IMb mailers to identify mail that is being entered incorrectly based on applicable tray separation requirements. Local mail preparation validation is conducted at Business Mail Entry Units on trays and other containers of bulk mail to confirm that preparation is in compliance with applicable Customer/Supplier Agreements and the Domestic Mail Manual before it is dispatched for processing. This process allows mailers to correct errors prior to release into the mailstream and keeps the mail in measurement. It also provides the mailer with some real-time insight into issues that may need to be resolved before future mailings are presented.

Presently, the Mailer Scorecard provides Full-Service IMb mailers with a data-rich electronic dashboard of information for each of their mailings submitted with an electronic postage statement.¹⁸ The scorecard allows mailers to track metrics and

¹⁷ See https://ribbs.usps.gov/intelligentmail_latestnews/documents/tech_guides/SPMExclusionsFactSheet.pdf.

¹⁸ A guide to the Mailer Scorecard is available for examination at the following link: https://ribbs.usps.gov/intelligentmail_guides/documents/tech_guides/GuideToMailerScorecard.pdf.

trends in connection with Move Update, eInduction, Seamless Acceptance and service performance measurement. The Postal Service is working to enhance the scorecard to provide more in-depth information regarding specific mail preparation errors, so that mailers can improve the quality of their mail preparation. Currently on the scorecard, mailers only are informed of the reason why their mail was excluded and the percentages of the volume that were removed for that specific reason. With enhancements scheduled for the spring of 2016, mailers will receive more detailed container and tray data not available today and more transparency regarding any mail volume that is excluded from measurement. These enhancements in customer access to useful data involve information beyond the needs of the reporting and compliance review process that takes place under sections 3652 and 3653. They serve as proof that much can be achieved to improve customer-supplier relations when the Postal Service and mailing industry collaborate on such matters without blurring the distinction between customer service and regulatory oversight.

CONCLUSION

The Postal Service shares the Commission's desire that the current measurement systems generate data sufficient to meet the Commission's regulatory obligations. As long as the current systems generate data that serve as the source of service measurement and reporting, the Postal Service will continue to cooperate fully in pursuit of all reasonable efforts to improve their reliability.

Respectfully submitted,

UNITED STATES Postal Service

By its attorneys:

Anthony F. Alverno

Chief Counsel, Global Business & Service
Development

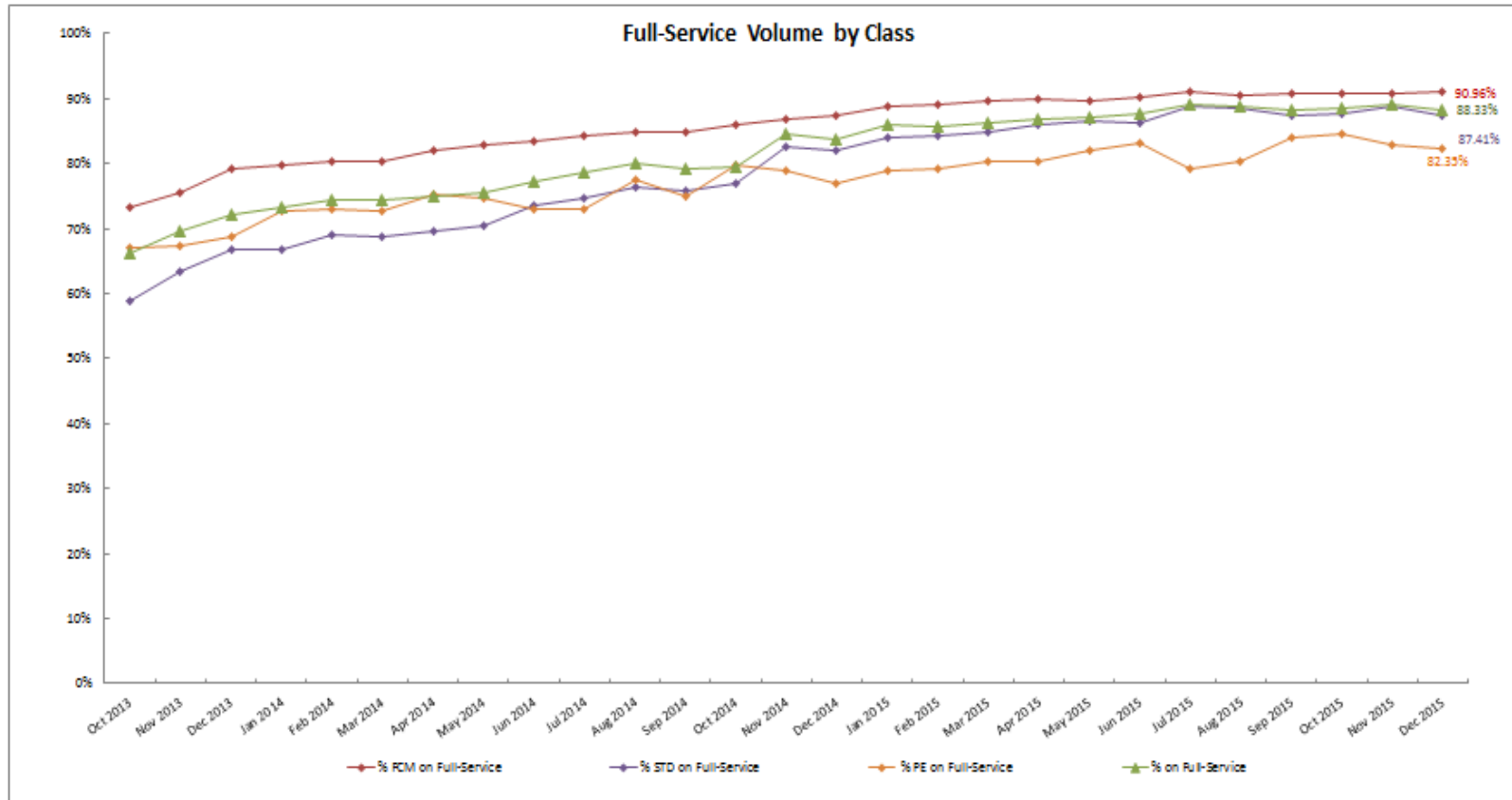
B. Jeff Meadows III

Michael T. Tidwell

Susan J. Walker

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1135
(202) 268-2997; Fax -5402
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Growth in Full-Service IMb Volume: FY 13 Q1 through FY 16 Q1



Source: USPS PostalOne! Data system

Docket No. PI2016-1 Attachment to USPS Reply Comments